

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

FILED

OCT 05 2021

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY mt DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

CESAR ALEJANDRO FONSECA-
ECHAVARRIA,
JOSE ANDREAS FONSECA-
ECHAVARRIA,

a/k/a Jay,

a/k/a Pony,

a/k/a Andreas,

JUAN ANTONIO CERVANTES-
ONTIVEROS,

a/k/a Juanito,

JEROME THOR CAMPBELL,

a/k/a Thor,

a/k/a Tulsa,

a/k/a Old School,

OSVALDO CALVILLO-OROPEZA,

a/k/a Soldado,

FELIX ANTONIO CAMPA-RIOS,

a/k/a Toro,

CALISTA CHARMAINE CLARK,

DEAN ALEXANDER MACK,

a/k/a Dante Maxey, and

JAVION JARREL WISBY,

Defendants.

No. **CR 21-275 C**

Violations: 21 U.S.C. § 846
21 U.S.C. § 841(a)(1)
18 U.S.C. § 2
21 U.S.C. § 843(b)
18 U.S.C. § 924(c)(1)(A)
18 U.S.C. § 922(g)(1)
18 U.S.C. § 1956(h)
18 U.S.C. § 1956(a)(2)(A)
18 U.S.C. § 924(d)
18 U.S.C. § 982(a)(1)
21 U.S.C. § 853
28 U.S.C. § 2461(c)

INDICTMENT

The Federal Grand Jury charges:

COUNT 1
(Drug Conspiracy)

From in or about March 2020, the exact date being unknown to the Grand Jury, and continuing thereafter through on or about March 30, 2021, within the Western District of Oklahoma and elsewhere,

----- **CESAR ALEJANDRO FONSECA-ECHAVARRIA,**
JOSE ANDREAS FONSECA-ECHAVARRIA,
a/k/a Jay,
a/k/a Pony,
a/k/a Andreas,
JUAN ANTONIO CERVANTES-ONTIVEROS,
a/k/a Juanito,
JEROME THOR CAMPBELL,
a/k/a Thor,
a/k/a Tulsa,
a/k/a Old School,
OSVALDO CALVILLO-OROPEZA,
a/k/a Soldado,
FELIX ANTONIO CAMPA-RIOS,
a/k/a Toro,
CALISTA CHARMAINE CLARK,
DEAN ALEXANDER MACK,
a/k/a Dante Maxey, and
JAVION JARREL WISBY -----

knowingly and intentionally conspired, combined, confederated, and agreed with each other and others, both known and unknown to the Grand Jury, to interdependently possess with intent to distribute and to distribute controlled substances, including 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance, 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, and 400 grams or more of a mixture or substance containing a detectable amount

of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (fentanyl), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

MANNER AND MEANS OF THE CONSPIRACY

The objects of the conspiracy were accomplished by the following means, among others:

1. During the period of the conspiracy, **CESAR ALEJANDRO FONSECA-ECHAVARRIA** and his brother **JOSE ANDREAS FONSECA-ECHAVARRIA** ran a drug-trafficking organization (the Fonseca DTO) in the Oklahoma City area. This organization was involved in the distribution of methamphetamine, heroin, and fentanyl throughout Oklahoma, as well as the collection of drug proceeds, some of which were then returned to Mexico by way of wire transfers.
2. During the period of the conspiracy, **CESAR ALEJANDRO FONSECA-ECHAVARRIA** and **JOSE ANDREAS FONSECA-ECHAVARRIA** directed the distribution of hundreds of pounds of methamphetamine and substantial quantities of heroin and fentanyl to customers of the Fonseca DTO. The distribution of methamphetamine was primarily coordinated by **CESAR ALEJANDRO FONSECA-ECHAVARRIA** with direct communication to a source of supply in Mexico. **CESAR ALEJANDRO FONSECA-ECHAVARRIA** traveled to Dallas and Houston, Texas, to pick up methamphetamine. Methamphetamine was also sent by way of the U.S. mail on occasion. Once that methamphetamine

was in Oklahoma, **CESAR ALEJANDRO FONSECA-ECHAVARRIA** would coordinate the distribution of that methamphetamine, both to **CESAR ALEJANDRO FONSECA-ECHAVARRIA**'s own customers and to customers arranged by the Mexican source of supply. These drugs would be delivered by **CESAR ALEJANDRO FONSECA-ECHAVARRIA** himself at times, but also through a network of individuals working for him, including **JOSE ANDREAS FONSECA-ECHAVARRIA**, **JUAN ANTONIO CERVANTES-ONTIVEROS**, **FELIX ANTONIO CAMPARIOS**, **OSVALDO CALVILLO-OROPEZA**, and others. Redistribution quantities of methamphetamine were delivered to customers including **JEROME THOR CAMPBELL**, **CALISTA CHARMAINE CLARK**, and **DEAN ALEXANDER MACK**.

3. During the period of the conspiracy, distribution of heroin was a smaller, but still important part of the Fonseca DTO's activities. When customers requested heroin, **CESAR ALEJANDRO FONSECA-ECHAVARRIA**, **JOSE ANDREAS FONSECA-ECHAVARRIA**, and others would coordinate with a source of supply for the heroin local to Oklahoma City. That local heroin source would supply the heroin for the Fonseca DTO to distribute to its customers, including **JEROME THOR CAMPBELL**.

4. During the period of the conspiracy, **CESAR ALEJANDRO FONSECA-ECHAVARRIA** and **JOSE ANDREAS FONSECA-**

ECHAVARRIA would orchestrate the importation of fentanyl pills from a source of supply in California. Packages of fentanyl pills were sent through the U.S. mail to locations around Oklahoma City, including to **CESAR ALEJANDRO FONSECA-ECHAVARRIA**'s residence. The fentanyl was then distributed to customers of the DTO, including **JAVION JARREL WISBY**.

5. During the period of the conspiracy, many of the activities of the Fonseca DTO were being directed by unindicted co-conspirators (UCCs) in Mexico. As a result, the DTO relied on the use of cell phones to coordinate these deliveries. Several of those cell phones—including phones belonging to **JOSE ANDREAS FONSECA-ECHAVARRIA (TT1)** and **CESAR ALEJANDRO FONSECA-ECHAVARRIA (TT2)**—were the subject of Title III wiretaps.

6. The Fonseca DTO would often front—or provide on consignment—significant quantities of methamphetamine to individuals associated with the conspiracy. Once the drugs were sold, the money from those drug sales was collected by individuals including **JOSE ANDREAS FONSECA-ECHAVARRIA**, **JUAN ANTONIO CERVANTES-ONTIVEROS**, and **OSVALDO CALVILLO-OROPEZA**. Some of this money was wired to Mexico by members of the conspiracy for the benefit of the Mexico-based UCCs. Significant quantities of bulk cash were also gathered by **CESAR ALEJANDRO FONSECA-ECHAVARRIA** and others and then given to

sources of methamphetamine supply in Dallas and Houston when additional methamphetamine was acquired. The Fonseca DTO would also travel to other cities, including Kansas City, to obtain bulk cash from other DTO cells operating in those cities.

The Grand Jury incorporates by reference all statements and allegations contained in Counts 2 through 47 and Counts 49 through 66 inclusive, as though fully set forth herein.

All in violation of Title 21, United States Code, Section 846, the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(A).

COUNT 2
(Distribution of Methamphetamine)

On or about March 19, 2020, in the Western District of Oklahoma,

----- **JOSE ANDREAS FONSECA-ECHAVARRIA,**
 a/k/a Jay,
 a/k/a Pony,
 a/k/a Andreas, and
 FELIX ANTONIO CAMPA-RIOS,
 a/k/a Toro, -----

knowingly and intentionally distributed approximately 300.2 grams of actual methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT 3
(Distribution of Methamphetamine)

On or about March 25, 2020, in the Western District of Oklahoma,

----- **JOSE ANDREAS FONSECA-ECHAVARRIA,**
 a/k/a Jay,
 a/k/a Pony,
 a/k/a Andreas, and
FELIX ANTONIO CAMPA-RIOS,
 a/k/a Toro, -----

knowingly and intentionally distributed approximately 412 grams of actual methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT 4
(Distribution of Methamphetamine)

On or about August 4, 2020, in the Western District of Oklahoma,

----- **JOSE ANDREAS FONSECA-ECHAVARRIA,**
 a/k/a Jay,
 a/k/a Pony,
 a/k/a Andreas, -----

knowingly and intentionally distributed approximately 110.2 grams of actual methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(A).

COUNT 5
(Distribution of Methamphetamine)

On or about August 12, 2020, in the Western District of Oklahoma,

----- **CESAR ALEJANDRO FONSECA-ECHAVARRIA and**
JOSE ANDREAS FONSECA-ECHAVARRIA,
a/k/a Jay,
a/k/a Pony,
a/k/a Andreas, -----

knowingly and intentionally distributed approximately 134 grams of actual methamphetamine, a Schedule II controlled substance, to an undercover law enforcement officer.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT 6
(Distribution of Methamphetamine)

On or about September 3, 2020, in the Western District of Oklahoma,

----- **JOSE ANDREAS FONSECA-ECHAVARRIA,**
a/k/a Jay,
a/k/a Pony,
a/k/a Andreas, -----

knowingly and intentionally distributed approximately 894.9 grams of actual methamphetamine, a Schedule II controlled substance, to an undercover law enforcement officer.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(A).

COUNT 7
(Distribution of Heroin)

On or about September 3, 2020, in the Western District of Oklahoma,

----- **JOSE ANDREAS FONSECA-ECHAVARRIA,**
 a/k/a Jay,
 a/k/a Pony,
 a/k/a Andreas, -----

knowingly and intentionally distributed approximately 100.2 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, to an undercover law enforcement officer.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(B).

COUNT 8
(Distribution of Fentanyl)

On or about September 3, 2020, in the Western District of Oklahoma,

----- **JOSE ANDREAS FONSECA-ECHAVARRIA,**
 a/k/a Jay,
 a/k/a Pony,
 a/k/a Andreas, -----

knowingly and intentionally distributed approximately 5.49 grams of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (fentanyl), a Schedule II controlled substance, to an undercover law enforcement officer.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(C).

COUNT 9
(Distribution of Heroin)

On or about September 23, 2020, in the Western District of Oklahoma,

----- **JOSE ANDREAS FONSECA-ECHAVARRIA,**
 a/k/a Jay,
 a/k/a Pony,
 a/k/a Andreas, -----

knowingly and intentionally distributed approximately 208.1 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, to an undercover law enforcement officer.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(B).

COUNT 10
(Distribution of Fentanyl)

On or about September 23, 2020, in the Western District of Oklahoma,

----- **JOSE ANDREAS FONSECA-ECHAVARRIA,**
 a/k/a Jay,
 a/k/a Pony,
 a/k/a Andreas, -----

knowingly and intentionally distributed approximately 3.694 grams of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (fentanyl), a Schedule II controlled substance, to an undercover law enforcement officer.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(C).

COUNT 11
(Distribution of Heroin)

On or about October 29, 2020, in the Western District of Oklahoma,

----- **CESAR ALEJANDRO FONSECA-ECHAVARRIA** -----

knowingly and intentionally distributed approximately 100.5 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, to an undercover law enforcement officer.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(B).

COUNT 12
(Possession of Methamphetamine with Intent to Distribute)

On or about December 17, 2020, in the Western District of Oklahoma and elsewhere,

----- **JOSE ANDREAS FONSECA-ECHAVARRIA,**
 a/k/a Jay,
 a/k/a Pony,
 a/k/a Andreas, -----

knowingly and intentionally possessed with intent to distribute approximately 107.6 grams of actual methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(A).

COUNT 13
(Unlawful Use of a Communication Facility)

Between on or about February 17, 2021, and on or about February 18, 2021, in call numbers 581, 602, 613, 637, 668, 677, 679, 681, 690–691, 693, and 701, intercepted on

TT1 in the Western District of Oklahoma,

----- **CESAR ALEJANDRO FONSECA-ECHAVARRIA,**
JOSE ANDREAS FONSECA-ECHAVARRIA,
a/k/a Jay,
a/k/a Pony,
a/k/a Andreas, and
JEROME THOR CAMPBELL,
a/k/a Thor,
a/k/a Tulsa,
a/k/a Old School, -----

knowingly and intentionally used a communication facility, that is, a cellular telephone, to facilitate the distribution of methamphetamine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 14
(Possession of Methamphetamine with Intent to Distribute)

On or about February 18, 2021, in the Western District of Oklahoma and elsewhere,

----- **CESAR ALEJANDRO FONSECA-ECHAVARRIA and**
JOSE ANDREAS FONSECA-ECHAVARRIA,
a/k/a Jay,
a/k/a Pony,
a/k/a Andreas, -----

knowingly and intentionally possessed with intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT 15
(Unlawful Use of a Communication Facility)

On or about February 24, 2021, in call numbers 871–872, and 881, intercepted on TT1 in the Western District of Oklahoma,

----- **CESAR ALEJANDRO FONSECA-ECHAVARRIA,**
JOSE ANDREAS FONSECA-ECHAVARRIA,
a/k/a Jay,
a/k/a Pony,
a/k/a Andreas, and
JEROME THOR CAMPBELL,
a/k/a Thor,
a/k/a Tulsa,
a/k/a Old School, -----

knowingly and intentionally used a communication facility, that is, a cellular telephone, to facilitate the distribution of methamphetamine, a Schedule II controlled substance, and the distribution of heroin, a Schedule I controlled substance, both felonies under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 16
(Possession of Methamphetamine with Intent to Distribute)

On or about February 24, 2021, in the Western District of Oklahoma and elsewhere,

----- **CESAR ALEJANDRO FONSECA-ECHAVARRIA,**
JOSE ANDREAS FONSECA-ECHAVARRIA,
a/k/a Jay,
a/k/a Pony,
a/k/a Andreas, and
JUAN ANTONIO CERVANTES-ONTIVEROS,
a/k/a Juanito, -----

knowingly and intentionally possessed with intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts,

isomers, or salts of its isomers, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT 17
(Possession of Heroin with Intent to Distribute)

On or about February 24, 2021, in the Western District of Oklahoma and elsewhere,

----- **CESAR ALEJANDRO FONSECA-ECHAVARRIA,**
JOSE ANDREAS FONSECA-ECHAVARRIA,
a/k/a Jay,
a/k/a Pony,
a/k/a Andreas, and
JUAN ANTONIO CERVANTES-ONTIVEROS,
a/k/a Juanito, -----

knowingly and intentionally possessed with intent to distribute a quantity of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 18
(Unlawful Use of a Communication Facility)

On or about March 1, 2021, in call numbers 1016, 1020, 1023–1024, 1044, 1051, and 1054, intercepted on TT1 in the Western District of Oklahoma,

----- **CESAR ALEJANDRO FONSECA-ECHAVARRIA,**
JOSE ANDREAS FONSECA-ECHAVARRIA,
a/k/a Jay,
a/k/a Pony,
a/k/a Andreas, and

JEROME THOR CAMPBELL,

a/k/a Thor,

a/k/a Tulsa,

a/k/a Old School, -----

knowingly and intentionally used a communication facility, that is, a cellular telephone, to facilitate the distribution of methamphetamine, a Schedule II controlled substance, and the distribution of heroin, a Schedule I controlled substance, both felonies under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 19

(Possession of Methamphetamine with Intent to Distribute)

On or about March 1, 2021, in the Western District of Oklahoma and elsewhere,

----- **CESAR ALEJANDRO FONSECA-ECHAVARRIA,**

JOSE ANDREAS FONSECA-ECHAVARRIA,

a/k/a Jay,

a/k/a Pony,

a/k/a Andreas, and

JUAN ANTONIO CERVANTES-ONTIVEROS,

a/k/a Juanito, -----

knowingly and intentionally possessed with intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT 20
(Possession of Heroin with Intent to Distribute)

On or about March 1, 2021, in the Western District of Oklahoma and elsewhere,

----- **CESAR ALEJANDRO FONSECA-ECHAVARRIA,**
JOSE ANDREAS FONSECA-ECHAVARRIA,
a/k/a Jay,
a/k/a Pony,
a/k/a Andreas, and
JUAN ANTONIO CERVANTES-ONTIVEROS,
a/k/a Juanito, -----

knowingly and intentionally possessed with intent to distribute a quantity of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 21
(Unlawful Use of a Communication Facility)

On or about March 8, 2021, in call numbers 1353, 1502, and 1517, intercepted on TT1 in the Western District of Oklahoma,

----- **CESAR ALEJANDRO FONSECA-ECHAVARRIA and**
JOSE ANDREAS FONSECA-ECHAVARRIA,
a/k/a Jay,
a/k/a Pony,
a/k/a Andreas, -----

knowingly and intentionally used a communication facility, that is, a cellular telephone, to facilitate the distribution of methamphetamine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 22

(Possession of Methamphetamine with Intent to Distribute)

On or about March 10, 2021, in the Western District of Oklahoma and elsewhere,

----- **CESAR ALEJANDRO FONSECA-ECHAVARRIA** -----

knowingly and intentionally possessed with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(A).

COUNT 23

(Unlawful Use of a Communication Facility)

On or about March 12, 2021, in call numbers 1622, 1637, 1651, 1659, 1662, 1668, 1679, 1682, 1692, 1696, 1698, 1704, 1706, 1709, and 1714, intercepted on TT1 in the Western District of Oklahoma,

----- **CESAR ALEJANDRO FONSECA-ECHAVARRIA,**
JOSE ANDREAS FONSECA-ECHAVARRIA,
a/k/a Jay,
a/k/a Pony,
a/k/a Andreas,
JUAN ANTONIO CERVANTES-ONTIVEROS,
a/k/a Juanito, and
JEROME THOR CAMPBELL,
a/k/a Thor,
a/k/a Tulsa,
a/k/a Old School, -----

knowingly and intentionally used a communication facility, that is, a cellular telephone, to facilitate the distribution of methamphetamine, a Schedule II controlled substance, and the

distribution of heroin, a Schedule I controlled substance, both felonies under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 24
(Possession of Methamphetamine with Intent to Distribute)

On or about March 12, 2021, in the Western District of Oklahoma and elsewhere,

----- **CESAR ALEJANDRO FONSECA-ECHAVARRIA,**
JOSE ANDREAS FONSECA-ECHAVARRIA,
a/k/a Jay,
a/k/a Pony,
a/k/a Andreas,
JUAN ANTONIO CERVANTES-ONTIVEROS,
a/k/a Juanito, and
OSVALDO CALVILLO-OROPEZA,
a/k/a Soldado, -----

knowingly and intentionally possessed with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT 25
(Possession of Heroin with Intent to Distribute)

On or about March 12, 2021, in the Western District of Oklahoma and elsewhere,

----- **CESAR ALEJANDRO FONSECA-ECHAVARRIA,**
JOSE ANDREAS FONSECA-ECHAVARRIA,
a/k/a Jay,
a/k/a Pony,
a/k/a Andreas,

**JUAN ANTONIO CERVANTES-ONTIVEROS,
a/k/a Juanito, and
OSVALDO CALVILLO-OROPEZA,
a/k/a Soldado, -----**

knowingly and intentionally possessed with intent to distribute 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(B), and Title 18, United States Code, Section 2.

**COUNT 26
(Unlawful Use of a Communication Facility)**

On or about March 13, 2021, in call numbers 37–38, 41–49, 51, 53–56, 63–64, 67–70, 74, and 77–78, intercepted on TT2 in the Western District of Oklahoma,

----- CESAR ALEJANDRO FONSECA-ECHAVARRIA -----
knowingly and intentionally used a communication facility, that is, a cellular telephone, to facilitate the distribution of methamphetamine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

**COUNT 27
(Possession of Methamphetamine with Intent to Distribute)**

On or about March 13, 2021, in the Western District of Oklahoma and elsewhere,

----- CESAR ALEJANDRO FONSECA-ECHAVARRIA -----
knowingly and intentionally possessed with intent to distribute 500 grams or more of a

mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(A).

COUNT 28
(Unlawful Use of a Communication Facility)

On or about March 15, 2021, in call numbers 151–152, 155–156, 158, and 160–161, intercepted on TT2 in the Western District of Oklahoma,

----- **CESAR ALEJANDRO FONSECA-ECHAVARRIA** -----
knowingly and intentionally used a communication facility, that is, a cellular telephone, to facilitate the distribution of methamphetamine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 29
(Distribution of Methamphetamine)

On or about March 15, 2021, in the Western District of Oklahoma,
----- **CESAR ALEJANDRO FONSECA-ECHAVARRIA** -----
knowingly and intentionally distributed 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance, to **CALISTA CHARMAINE CLARK** and **DEAN ALEXANDER MACK**.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT 30
(Possession of Methamphetamine with Intent to Distribute)

On or about March 15, 2021, in the Western District of Oklahoma,

----- **CALISTA CHARMAINE CLARK and**
DEAN ALEXANDER MACK,
a/k/a Dante Maxey, -----

knowingly and intentionally possessed with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT 31
(Possession of a Firearm in Furtherance of a Drug-Trafficking Crime)

On or about March 15, 2021, in the Western District of Oklahoma,

----- **DEAN ALEXANDER MACK,**
a/k/a Dante Maxey, -----

knowingly possessed a firearm, to wit: a Smith & Wesson, model SD9 VE, 9mm caliber pistol, bearing serial number FWR6258, in furtherance of a drug-trafficking crime for which he may be prosecuted in a court of the United States, that is, possession of methamphetamine with intent to distribute, as charged in Count 30.

All in violation of Title 18, United States Code, Section 924(c)(1)(A), the penalty for which is found at Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 32
(Felon in Possession of a Firearm)

On or about March 15, 2021, in the Western District of Oklahoma,

----- **DEAN ALEXANDER MACK,**
a/k/a Dante Maxey, -----

with knowledge that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, to wit: a Smith & Wesson, model SD9 VE, 9mm caliber pistol, bearing serial number FWR6258, which was in and affecting interstate commerce in that said firearm had previously crossed state lines to reach the state of Oklahoma.

All in violation of Title 18, United States Code, Section 922(g)(1), the penalty for which is found at Title 18, United States Code, Section 924(a)(2).

COUNT 33
(Unlawful Use of a Communication Facility)

On or about March 16, 2021, in call numbers 193–195, 198–200, 202, and 205, intercepted on TT2 in the Western District of Oklahoma,

----- **CESAR ALEJANDRO FONSECA-ECHAVARRIA and**
JUAN ANTONIO CERVANTES-ONTIVEROS,
a/k/a Juanito, -----

knowingly and intentionally used a communication facility, that is, a cellular telephone, to facilitate the distribution of methamphetamine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 34
(Possession of Methamphetamine with Intent to Distribute)

On or about March 16, 2021, in the Western District of Oklahoma,

----- **CESAR ALEJANDRO FONSECA-ECHAVARRIA and**
JUAN ANTONIO CERVANTES-ONTIVEROS,
a/k/a Juanito, -----

knowingly and intentionally possessed with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT 35
(Unlawful Use of a Communication Facility)

On or about March 21, 2021, in call numbers 359, 361–362, 365–366, and 380, intercepted on TT2 in the Western District of Oklahoma,

----- **CESAR ALEJANDRO FONSECA-ECHAVARRIA and**
JUAN ANTONIO CERVANTES-ONTIVEROS,
a/k/a Juanito, -----

knowingly and intentionally used a communication facility, that is, a cellular telephone, to facilitate the distribution of methamphetamine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 36
(Distribution of Methamphetamine)

On or about March 21, 2021, in the Western District of Oklahoma and elsewhere,

----- **CESAR ALEJANDRO FONSECA-ECHAVARRIA and**
JUAN ANTONIO CERVANTES-ONTIVEROS,
a/k/a Juanito, -----

knowingly and intentionally distributed 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT 37
(Unlawful Use of a Communication Facility)

Between on or about March 21, 2021, and on or about March 22, 2021, in call numbers 385, 411, 416, 420–421, 423, 425–428, 432–436, 438–440, and 450–454, intercepted on TT2 in the Western District of Oklahoma,

----- **CESAR ALEJANDRO FONSECA-ECHAVARRIA** -----

knowingly and intentionally used a communication facility, that is, a cellular telephone, to facilitate the distribution of methamphetamine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 38
(Possession of Methamphetamine with Intent to Distribute)

On or about March 22, 2021, in the Western District of Oklahoma and elsewhere,

----- **CESAR ALEJANDRO FONSECA-ECHAVARRIA** -----

knowingly and intentionally possessed with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(A).

COUNT 39
(Unlawful Use of a Communication Facility)

On or about March 22, 2021, in call numbers 443–448, 455–456, and 460–463, intercepted on TT2 in the Western District of Oklahoma,

----- **CESAR ALEJANDRO FONSECA-ECHAVARRIA** -----

knowingly and intentionally used a communication facility, that is, a cellular telephone, to facilitate the distribution of methamphetamine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 40
(Possession of Methamphetamine with Intent to Distribute)

On or about March 22, 2021, in the Western District of Oklahoma and elsewhere,

----- **CESAR ALEJANDRO FONSECA-ECHAVARRIA** -----

knowingly and intentionally possessed with intent to distribute 500 grams or more of a

mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(A).

COUNT 41
(Unlawful Use of a Communication Facility)

On or about March 23, 2021, in call numbers 526–530, 533, 538, 542, and 544–545, intercepted on TT2 in the Western District of Oklahoma,

----- **CESAR ALEJANDRO FONSECA-ECHAVARRIA and**
JUAN ANTONIO CERVANTES-ONTIVEROS,
a/k/a Juanito, -----

knowingly and intentionally used a communication facility, that is, a cellular telephone, to facilitate the distribution of methamphetamine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 42
(Distribution of Methamphetamine)

On or about March 23, 2021, in the Western District of Oklahoma and elsewhere,

----- **CESAR ALEJANDRO FONSECA-ECHAVARRIA and**
JUAN ANTONIO CERVANTES-ONTIVEROS,
a/k/a Juanito, -----

knowingly and intentionally distributed 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for

which is found at Title 21, United States Code, Section 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT 43
(Unlawful Use of a Communication Facility)

On or about March 23, 2021, in call numbers 546–547, 549, 552, and 554, intercepted on TT2 in the Western District of Oklahoma,

----- **CESAR ALEJANDRO FONSECA-ECHAVARRIA and
JOSE ANDREAS FONSECA-ECHAVARRIA,**
a/k/a Jay,
a/k/a Pony,
a/k/a Andreas, -----

knowingly and intentionally used a communication facility, that is, a cellular telephone, to facilitate the distribution of methamphetamine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 44
(Possession of Methamphetamine with Intent to Distribute)

On or about March 23, 2021, in the Western District of Oklahoma and elsewhere,

----- **CESAR ALEJANDRO FONSECA-ECHAVARRIA,
JOSE ANDREAS FONSECA-ECHAVARRIA,**
a/k/a Jay,
a/k/a Pony,
a/k/a Andreas, and
OSVALDO CALVILLO-OROPEZA,
a/k/a Soldado, -----

knowingly and intentionally possessed with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT 45
(Unlawful Use of a Communication Facility)

On or about March 29, 2021, in call numbers 2547–2548, 2551, and 2568–2571, intercepted on TT1 in the Western District of Oklahoma,

----- **CESAR ALEJANDRO FONSECA-ECHAVARRIA,**
JOSE ANDREAS FONSECA-ECHAVARRIA,
a/k/a Jay,
a/k/a Pony,
a/k/a Andreas, and
JUAN ANTONIO CERVANTES-ONTIVEROS,
a/k/a Juanito, -----

knowingly and intentionally used a communication facility, that is, a cellular telephone, to facilitate the distribution of fentanyl, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 46
(Distribution of Fentanyl)

On or about March 29, 2021, in the Western District of Oklahoma,

----- **CESAR ALEJANDRO FONSECA-ECHAVARRIA,**
JOSE ANDREAS FONSECA-ECHAVARRIA,
a/k/a Jay,
a/k/a Pony,
a/k/a Andreas, and
JUAN ANTONIO CERVANTES-ONTIVEROS,
a/k/a Juanito, -----

knowingly and intentionally distributed 40 grams or more of a mixture or substance

containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (fentanyl), a Schedule II controlled substance, to **JAVION JARREL WISBY**.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT 47
(Possession of Fentanyl with Intent to Distribute)

On or about March 29, 2021, in the Western District of Oklahoma,

----- **JAVION JARREL WISBY** -----

knowingly and intentionally possessed with intent to distribute 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (fentanyl), a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(B).

COUNT 48
(Money Laundering Conspiracy)

From in or about November 2020, the exact date being unknown to the Grand Jury, and continuing thereafter through on or about March 25, 2021, in the Western District of Oklahoma and elsewhere,

----- **CESAR ALEJANDRO FONSECA-ECHAVARRIA,**
JOSE ANDREAS FONSECA-ECHAVARRIA,
a/k/a Jay,
a/k/a Pony,
a/k/a Andreas,

**JUAN ANTONIO CERVANTES-ONTIVEROS,
a/k/a Juanito, and
OSVALDO CALVILLO-OROPEZA,
a/k/a Soldado, -----**

knowingly and intentionally combined, conspired, and agreed with each other and others, both known and unknown to the Grand Jury, to interdependently conduct financial transactions affecting interstate commerce in violation of Title 18, United States Code, Section 1956(h), to wit: knowingly transporting, transmitting, or transferring, or attempting to transport, transmit, or transfer a monetary instrument or funds from a place in the United States to or through a place outside the United States, knowing that the transactions were designed with the intent to promote the carrying on of specified unlawful activity—that is, the felonious buying, selling, and dealing in controlled substances and conspiring to do the same, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, both specified unlawful activities, in violation of Title 18, United States Code, Section 1956(a)(2)(A).

MANNER AND MEANS OF THE CONSPIRACY

The objects of the conspiracy were to be accomplished and were accomplished by the following means, among others:

1. During the period of the conspiracy, **CESAR ALEJANDRO FONSECA-ECHAVARRIA** and **JOSE ANDREAS FONSECA-ECHAVARRIA** would gather money from the sale of methamphetamine, heroin, and fentanyl. A significant portion of the proceeds were taken to Dallas and Houston where it was used to pay for additional shipments of

methamphetamine. Other portions of the drug proceeds were wired to Mexico at the direction of an individual or individuals in Mexico.

2. During the period of the conspiracy, **CESAR ALEJANDRO FONSECA-ECHAVARRIA** was in communication with unindicted co-conspirators (UCCs) in Mexico. Some of these UCCs directed **CESAR ALEJANDRO FONSECA-ECHAVARRIA**'s activity in picking up bulk methamphetamine and/or shipments of fentanyl and further distributing a portion of those controlled substances. **CESAR ALEJANDRO FONSECA-ECHAVARRIA** would also receive requests to wire money to Mexico from these UCCs. **CESAR ALEJANDRO FONSECA-ECHAVARRIA** would then enlist the help of others, including **JOSE ANDREAS FONSECA-ECHAVARRIA**, **JUAN ANTONIO CERVANTES-ONTIVEROS** and **OSVALDO CALVILLO-OROPEZA** to conduct financial transactions—that is, the wiring of money associated with the drug activity of the Fonseca DTO to Mexico. Those wire transfers were received by UCCs, or those designated by the UCCs. The wiring of this money promoted the activities of the Fonseca DTO because payment to Mexico-based sources of supply for controlled substances received and distributed facilitated the receipt of additional controlled substances in the future.

3. During the period of the conspiracy, **CESAR ALEJANDRO FONSECA-ECHAVARRIA**, **JOSE ANDREAS FONSECA-**

ECHAVARRIA, JUAN ANTONIO CERVANTES-ONTIVEROS, OSVALDO CALVILLO-OROPEZA, and others utilized cell phones to facilitate their drug and money-laundering activities.

The Grand Jury incorporates by reference all statements and allegations contained in Counts 4 through 47 and Counts 49 through 66 inclusive, as though fully set forth herein.

All in violation of Title 18, United States Code, Section 1956(h).

COUNTS 49-60
(Money Laundering)

On or about the date listed below, in the Western District of Oklahoma,

----- **JOSE ANDREAS FONSECA-ECHAVARRIA,**
a/k/a Jay,
a/k/a Pony,
a/k/a Andreas, -----

knowingly transported, transmitted, and transferred a monetary instrument and funds from a place in the United States to a place outside the United States with the intent to promote the carrying on of a specified unlawful activity—that is, the felonious buying, selling, and dealing in controlled substances and conspiring to do the same, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, both specified unlawful activities.

<u>Count</u>	<u>Date</u>	<u>Tracking Number</u>	<u>Amount</u>	<u>Recipient</u>	<u>To</u>	<u>From</u>
49	2/23/2021	98803768	\$881.19	G.B.C.	Michoacán, Mexico	Jose Echevarria
50	2/23/2021	700750588993	\$876.00	M.G.S.A.	Michoacán, Mexico	Jose Echevarria Castillo
51	3/11/2021	99675420	\$881.19	R.C.C.V.	Michoacán, Mexico	Jose Echevarria
52	3/12/2021	203181994	\$864.00	A.V.B.	Michoacán, Mexico	Jose Echeverria

<u>Count</u>	<u>Date</u>	<u>Tracking Number</u>	<u>Amount</u>	<u>Recipient</u>	<u>To</u>	<u>From</u>
53	3/15/2021	99950316	\$881.19	A.V.B.	Michoacán, Mexico	Jose Echeverria
54	3/17/2021	E01106480512	\$929.00	J.O.M.J	Baja California, Mexico	Francisco Reginaldo Morales Jimenez
55	3/21/2021	E01106516759	\$876.00	J.H.S.V.	Baja California, Mexico	Jose Echeverria
56	3/21/2021	700752652821	\$876.00	J.H.S.V.	Baja California, Mexico	Jose Echevarria
57	3/25/2021	E01106547281	\$700.00	V.C.G.	Michoacán, Mexico	Jose Echevarria
58	3/25/2021	E01106547305	\$930.00	A.C.G	Sinaloa, Mexico	Leeandra Luz Carrasco
59	3/25/2021	E01106547338	\$930.00	M.A.R.G.	Tijuana, Mexico	Damien Andrew Franco
60	3/25/2021	E01106547245	\$800.00	D.B.G.C.	Michoacán, Mexico	Kimberlee Starr Carrasco

All in violation of Title 18, United States Code, Section 1956(a)(2)(A), and Title 18, United States Code, Section 2.

COUNTS 61-64
(Money Laundering)

On or about the dates listed below, in the Western District of Oklahoma,

----- **JUAN ANTONIO CERVANTES-ONTIVEROS,**
a/k/a Juanito, -----

knowingly transported, transmitted, and transferred a monetary instrument and funds from a place in the United States to a place outside the United States with the intent to promote the carrying on of a specified unlawful activity—that is, the felonious buying, selling, and

dealing in controlled substances and conspiring to do the same, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, both specified unlawful activities.

<u>Count</u>	<u>Date</u>	<u>Tracking Number</u>	<u>Amount</u>	<u>Recipient</u>	<u>To</u>	<u>From</u>
61	11/18/2020	700744049599	\$925.00	B.C.I.	Sinaloa, Mexico	Juan Antonio Cervantes
62	12/8/2020	700745358403	\$930.00	J.H.S.V.	Baja California, Mexico	Juan Antonio Cervantes
63	1/23/2021	97213580	\$881.00	T.C.	Michoacán, Mexico	Juan Antonio Cervantes Ontiveros
64	2/18/2021	700750213311	\$930.69	B.C.I.	Baja California, Mexico	Juan Antonio Cervantes

All in violation of Title 18, United States Code, Section 1956(a)(2)(A), and Title 18, United States Code, Section 2.

COUNTS 65-66
(Money Laundering)

On or about the dates listed below, in the Western District of Oklahoma,

----- **OSVALDO CALVILLO-OROPEZA,**
a/k/a Soldado, -----

knowingly transported, transmitted, and transferred a monetary instrument and funds from a place in the United States to a place outside the United States with the intent to promote the carrying on of a specified unlawful activity—that is, the felonious buying, selling, and dealing in controlled substances and conspiring to do the same, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, both specified unlawful activities.

<u>Count</u>	<u>Date</u>	<u>Tracking Number</u>	<u>Amount</u>	<u>Recipient</u>	<u>To</u>	<u>From</u>
65	11/30/2020	700744851317	\$930.70	B.C.I.	Michoacán, Mexico	Osvaldo Noe Calvillo Oropesa
66	1/23/2021	E01106092055	\$881.00	A.V.B.	Michoacán, Mexico	Osvaldo Calvillo Oropeza

All in violation of Title 18, United States Code, Section 1956(a)(2)(A), and Title 18, United States Code, Section 2.

FORFEITURE

The allegations contained in this Indictment are hereby re-alleged and incorporated for the purpose of alleging forfeiture.

Upon conviction of any of the offenses alleged in Counts 1-30 and 33-47 of this Indictment, defendants **CESAR ALEJANDRO FONSECA-ECHAVARRIA, JOSE ANDREAS FONSECA-ECHAVARRIA, JUAN ANTONIO CERVANTES-ONTIVEROS, JEROME THOR CAMPBELL, OSVALDO CALVILLO-OROPEZA, FELIX ANTONIO CAMPA-RIOS, CALISTA CHARMAINE CLARK, DEAN ALEXANDER MACK, and JAVION JARREL WISBY** shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense.

Upon conviction of any of the offenses alleged in Counts 31 and 32 of this Indictment, defendant **DEAN ALEXANDER MACK** shall forfeit to the United States any and all firearms and ammunition involved in the commission of the offense.

Upon conviction of any of the offenses alleged in Counts 48-66 of this Indictment, defendants **CESAR ALEJANDRO FONSECA-ECHAVARRIA, JOSE ANDREAS FONSECA-ECHAVARRIA, JUAN ANTONIO CERVANTES-ONTIVEROS,** and **OSVALDO CALVILLO-OROPEZA** shall forfeit to the United States any property, real or personal, involved in such offenses, or any property traceable to such property.

The property subject to forfeiture includes, but is not limited to:

1. a Smith & Wesson, model SD9 VE, 9mm caliber pistol, bearing serial number FWR6258, and
2. any and all ammunition and magazines not specified herein.

All pursuant to Title 18, United States Code, Section 924(d), Title 18, United States Code, Section 982(a)(1), Title 21, United States Code, Section 853, and Title 28, United States Code, Section 2461(c).


A TRUE BILL:



FOREPERSON OF THE GRAND JURY



ROBERT J. TROESTER
Acting United States Attorney



THOMAS B. SNYDER
DANIELLE M. CONNOLLY
Assistant United States Attorneys